

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

## **DEFENDANTS' EXHIBIT LIST**

Defendants Tarrant County Hospital District d/b/a JPS Health Network and John Peter Smith Hospital (“JPS”) and Acclaim Physician Group (“Acclaim”) (collectively, “Defendants”) submit this exhibit list in accordance with the Court’s Scheduling Order (ECF No. 24):

<b>Ex. No.</b>	<b>Description</b>	<b>Bates No.</b>	<b>Offered</b>	<b>Admitted</b>
1.	2016 Employment Agreement by and between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D.	ACC_000059- ACC_000075		
2.	2017 Employment Agreement by and between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D.	ACC_000001- ACC_000019		
3.	First Amendment to MD-Residency Training Program Director between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D.	ACC_000020- ACC_000029		
4.	Second Amendment to Employment Agreement between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D.	ACC_000030- ACC_000031		
5.	Third Amendment to Employment Agreement between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D.	ACC_000032- ACC_000034		

<b>Ex. No.</b>	<b>Description</b>	<b>Bates No.</b>	<b>Offered</b>	<b>Admitted</b>
6.	Fourth Amendment to Employment Agreement between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D.	ACC_000035- ACC_000036		
7.	Fifth Amendment to Employment Agreement between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D. (Pandemic Plan Amendment)	ACC_000037- ACC_000039		
8.	Sixth Amendment to Employment Agreement between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D.	ACC_000040- ACC_000041		
9.	Seventh Amendment to Employment Agreement between Acclaim Physician Group, Inc. and Cheryl Hurd, M.D. (effective September 1, 2022)	N/A		
10.	Notice of Non-Renewal (email to Plaintiff's counsel dated September 1, 2022)	N/A		
11.	Announcement of Dr. Dustin DeMoss as the new Vice Chair of Education and Psychiatry Residency Program Director dated March 18, 2022	JPS_000392- JPS_000393		
12.	JPS HR email regarding Provider Concern dated December 14, 2021	JPS_000347- JPS_000348		
13.	JPS HR emails regarding Acclaim Concern dated December 23, 2021, and statements	JPS_000338- JPS_000344		
14.	JPS HR email regarding Acclaim Concern dated December 29, 2021	JPS_000329- JPS_000336		
15.	JPS HR email regarding Information Needed dated December 30, 2021	JPS_000337		
16.	JPS HR email regarding Update dated January 6, 2022	JPS_000353		
17.	JPS HR email regarding Information Needed dated January 11, 2022	JPS_000345- JPS_000346		
18.	JPS HR email regarding Statement Received dated January 20, 2022	JPS_000356		
19.	JPS HR email regarding Statement from Dr. Hurd dated January 20, 2022, and statement	JPS_000349- JPS_000350		

<b>Ex. No.</b>	<b>Description</b>	<b>Bates No.</b>	<b>Offered</b>	<b>Admitted</b>
20.	Text Messages (Dr. Hurd and Dr. Alphonso)	HURD_001651		
21.	Text Messages (Dr. Hurd and Chris)	HURD_001591-HURD_001618		
22.	Text Messages (Dr. Hurd and Dr. Huff-Benjamin)	HURD_001710-HURD_001711		
23.	Text Messages (Dr. Hurd and Dr. Saks)	HURD_001624-HURD_001628		
24.	Text Messages (Dr. Hurd and Janet Miles)	HURD_001712-HURD_001752		
25.	Text Messages (Dr. Hurd and Dr. Haliburton)	HURD_001658-HURD_001709		
26.	Text Messages (Dr. Hurd and Jennifer Keene)	HURD_001759-HURD_001782		
27.	Text Messages (Dr. Hurd and Dr. Hafeez)	HURD_001567-HURD_001580		
28.	Text Messages (Dr. Hurd and Sandy)	HURD_001883-HURD_001891		
29.	Text Messages (Dr. Hurd and Lydia)	HURD_001825-HURD_001846		
30.	Podawiltz M.D. email to Becker M.D. on Talking Points with faculty member dated March 16, 2022, and attachment	ACC_000203-ACC_000204		
31.	Code of Conduct and Business Ethics, Acclaim Physician Group, Inc.	ACC_000042-ACC_000058		
32.	JPS MS 100 Medical Staff Code of Conduct	JPS_000574		
33.	JPS MS 101 Code of Conduct Procedure	JPS_000144-JPS_000150		
34.	JPS Medical Staff Rules and Regulations	JPS_000290-JPS_000328		

This Exhibit List contains the information required by §§ II(7) and II(8)(c) of the Court's Scheduling Order (ECF No. 24), except for the written statement required by §§ II(8)(c)(i)-(ii), which Defendants will provide prior to the November 18 deadline set by §II(8) once the parties

have conferred about the admissibility of exhibits. The numbering of the exhibits may also be updated prior to the November 18 deadline to reflect any agreements between the parties' counsel regarding the numbering of exhibits.

Defendants reserve the right to use the aforementioned exhibits (or excerpts of them) in the form of blow-up, form-board, or other summary evidence at trial, but recognize no such blow-up, form-board, or other summary shall be a new substantive content.

Defendants reserve the right to utilize and offer evidence and exhibits, as necessary, for purposes of impeachment.

Respectfully submitted,

/s/ Jordan M. Parker  
Jordan M. Parker  
State Bar No. 15491400  
[jparker@canteyhanger.com](mailto:jparker@canteyhanger.com)  
Derek Carson  
State Bar No. 24085240  
[dcarson@canteyhanger.com](mailto:dcarson@canteyhanger.com)  
Alexandra M. Williams  
State Bar No. 24107297  
[awilliams@canteyhanger.com](mailto:awilliams@canteyhanger.com)  
CANTEY HANGER LLP  
Cantey Hanger Plaza  
600 W. 6th St., Suite 300  
Fort Worth, TX 76102  
(817) 877-2800 (phone)  
(817) 877-2807 (fax)

**COUNSEL FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of this document was served on all counsel of record via this Court's ECF system on November 4, 2022.

/s/ Jordan M. Parker  
Jordan M. Parker